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Substantive Comments in Response to:
Grandfather, Appalachian, Pisgah Restoration Project (GAP Project)

The GAP Project, as described in the GAP Newsletter 10-05-2022, is a confusing jumble of project-level goals and objectives with neither detail nor description of specific actions or methods and taking place at no certain location other than 'Areas of Interest' that encompass tens of thousands of acres scattered across the three ranger districts of Pisgah National Forest. As presented, it is not what can be considered a PROJECT proposal.

The GAP document refers to the Pisgah Restoration Initiative (PRI) and links to a document describing that. The PRI is itself a very general proposal to address ecological restoration objectives in an "All Lands" approach. The PRI refers to the Forest Plan (which was still a work in progress when the PRI was written) and mentions 'additional restoration work that can be accomplished with greater collaboration and coordination, and by working at a larger scale than could be accomplished by the Forest Service alone.' Such collaborative work was considered to be part of Tier 2 goals in the Forest Plan. Neither the GAP nor the PRI make any reference to goals of the Forest Plan and it is unclear how GAP goals and objectives directly relate to specific Tier goals for actions such as prescribed fire, young forest creation, non-native invasive species, etc.... The restore native ecosystems aspect of PRI alone proposes up to 18,000 acres of silvicultural treatments, 5,000 acres of commercial timber harvest, and 1,500 acres of woodlands initiation. How do these actions relate to Forest Plan tier goals? Are they Tier 1 or Tier 2 goals? This is entirely unclear.

The GAP project is focused on landscape scale goals and objectives and yet it ignores Nantahala National Forest which shares both boundaries and the same Forest Plan as Pisgah National Forest. It is non-sensical to propose such a large initiative across the landscape and then apply it only to a part of the USFS lands which are included in the Forest Plan. If the plan is good for Pisgah then why isn't it good for Nantahala? Will there be a different plan for Nantahala? Is Nantahala not in need of the same ecological restoration?

What differentiates the GAP project goals and objectives from the Forest Plan itself - other than the omission of Nantahala National Forest? Why is there a need for a large project like GAP when the Forest Plan is intended to address exactly the same goals and objectives but across both Pisgah and Nantahala National Forests? I fail to understand the purpose of the GAP project as proposed. It is entirely too large and encompasses too many distinct actions across too many (unspecified) places to be managed as a project. A project has specific measurable achievements related to specific actions and taking place in specific places using specific methods. I would expect that the Priority Outcomes noted in the PRI (shown below)

Priority Outcome	Treatment	Units Treated annually without CFLRP Funding	Units Treated annually with CFLRP Funding
Wildfire Risk Reduction	Prescribed Fire and Managed Wildfire	4,000 acres	10,000-18,000 acres
	Mechanical Fuels Thinnings	0 acres	100 acres
Restore Native Ecosystems	Silvicultural Treatments	1,000 acres	1,800 acres
	Commercial Timber Harvest	300 acres	500 acres
	Woodlands Initiated	50 acres	150 acres
NNIS, Insects, and Pathogens	Pest/Pathogen treatment (EAB, HWA)	100 acres	200 acres
	NNIS Control	500 acres	1,000 acres
Clean and Abundant Water	Streamside Vegetation Restoration	2 miles	6 miles
	Artificial Fish Barriers Removed and AOPs	1	3
	Trail and Road miles maintained to standard	400 miles	660 miles

are accomplished in many individual projects that have their own environmental analysis, and each project is monitored, evaluated and reported on. I would further expect that the scope of the work involves inter-dependencies between projects and significant human resource planning to optimize the effort. It does not make sense to propose such a large scale effort that spans 10 years as a single project.

With or without CFLRP funding the number of different treatments and the units treated annually are much larger than can or should be managed as a project. Putting so much work spread across so many tasks into a single project is simply a bad practice.

A project refers to a specific, singular endeavor to deliver a tangible output. A program refers to multiple projects which are managed and delivered as a single package. As described and proposed GAP is a program not a project.

see: <https://apmg-international.com/article/difference-between-project-and-program#:~:text=A%20project%20represents%20a%20single,in%20achieving%20its%20overall%20objectives.>

Effort:

A project represents a single, focused endeavor.

A program is a collection of projects – together all the projects form a connected package of work. The different projects complement each other to assist the program in achieving its overall objectives. It's likely the different projects within a program will overlap – the program manager will therefore assess these overlaps and work with the relevant project managers to ensure the program's smooth progression.

Length:

While some projects take several years – the typical project will not take very long to complete. Programs often take a very long time to complete as they intend to deliver more. It's therefore common for programs to be organized into phases or tranches.

A particularly long project may also be organized into multiple phases – but this is less common.

Benefits:

Projects focus on achieving tangible outputs, i.e. what you gain upon completing the project.

Programs focus on outcomes – which are often not tangible. The benefits provided by a program depend on the collective benefits of its projects. Examples of a program outcome include a cultural or political change within an organization – or a change in the way in which an organization operates.

Across many disciplines and industries the structuring of projects as parts of programs is accepted as best practice. It has been proven to lead to better outcomes. Projects are best managed as discreet work efforts with specific goals, objectives, and intended results. Programs are used to manage many related projects. At the project level it is then easier to report on success/failure and measure outcomes - because they are very specific. At the program level the reporting is focused on how each project is contributing to the overall success of the program and thus how successful the program is.

I cannot support the GAP project as it is currently structured, i.e. as a project. There is insufficient detail of the actions, methods, and places where work will occur. There are no benchmarks provided that would be used to indicate success or failure. The mentioned benefits are too generic and thus they are unable to be measured or reported on. There is no direct relationship between GAP goals and objectives and Forest Plan goals and objectives.

Aside from the previously discussed concerns about project structure I have significant concerns about the lack of detail regarding specific treatments and the inclusion of very large 'Areas of Interest' which describe possible locations for treatments. Some treatments such as 'Prescribed Fire and Managed Wildfire' are easily understood. Other treatments such as 'Silvicultural Treatments' should be defined more specifically. The USFS must provide a glossary of terms and definitions for every treatment described. I can only make substantive comments to the extent that the USFS has substantively described their intended actions and the specific location for those actions. So, in the case where the USFS fails to substantively define and describe their intended actions and the locations for those actions then my substantive comment is that I cannot, in any way, support the proposal until it is described in sufficient detail. The table extracted from the PRI (shown above) is not at all useful in any context at the project proposal level. Further, any mention of 'treated annually' implies a long-running effort spanning multiple projects which again signals that this is not a single project but rather a series of projects spanning many years.

The relationship of the GAP project to the Forest Plan is not discussed other than to say it is built 'using thinking for the revised plan' and that it will be 'consistent with the forest plan that is in effect at the time the project decision is signed.' I will re-iterate - I cannot support any proposal which is not adequately defined and described. Of course any project will be consistent with the Forest Plan, that's required by law. The Forest Plan is a high level document that provides large scale goals and objectives covering the entire term (20 years) of the plan. I don't see how GAP is any different from the large scale plan other than that GAP covers only Pisgah NF and has its own (lower) goals for treatments. But GAP does not say how its own goals related to the higher level goals of the Plan nor whether GAP goals and objectives are part of Tier 1 or Tier 2 or both. There is no discussion of how GAP relates to the Plan in terms of the goals and objectives. What percent of Tier 1 and or Tier 2 goals will be met by GAP? Since GAP is focused only on Pisgah NF how will Tier 1 and Tier 2 goals be met in Nantahala NF? Will there be a similar project for Nantahala? Does GAP detract from work in Nantahala NF given that it is such a large and complex proposal?

The project documents include specific mention of requirements for substantive comments and even a detailed flow-chart of the comment process. On one hand I can appreciate that the USFS is interested in getting good comments and thus is providing some reference material. On the other hand, I think the inclusion of such detailed 'guidance' serves to intimidate

concerned individuals who might comment but don't feel they can meet the high bar the USFS sets for substantive comments. As I have mentioned numerous times in my comments, the USFS has utterly failed to provide enough detail about the proposed project to enable informed comment from the public. In the GAP Newsletter the USFS restates the regulation, 'Only individuals or entities (as defined by 36 CFR 218.2) who submit timely and specific written comments about this proposed project during this or other public participation periods established by the responsible official will be eligible to file an objection. For the purposes of this rule, "specific written comments" are within the scope of the proposed action, have a direct relationship to the proposed action, and must include supporting reasons for the responsible official to consider (36 CFR 218.2).'

If the public is obliged to provide specific detailed comments related to the proposed project then certainly the USFS is obliged to document and describe the project at a level of detail sufficient for comment regarding the scope of the action, the location(s) of the action(s), and the intended objectives and benefits of the action(s). Further, the USFS is required by law to provide an Environmental Analysis of every proposed project action and for all proposed locations. I am concerned that the USFS intention is to perform a single environmental analysis for the entire 10-year GAP project and then consider this satisfies NEPA. The GAP newsletter states TWICE 'the environmental analysis' - so my concern is not unfounded. I understand the GAP project is at a developing stage and such details might not be available at this time. In such a case I do not think it is fair, nor do I think it is prudent, for the USFS to place a burden of specificity on public comment when the USFS itself is not able to provide an appropriate level of specificity in the proposal. Given the vagueness of the current proposal I would consider nearly any comment to be as substantive as the proposal itself.

How can the GAP proposal be improved to gain my support?

- GAP should be proposed as a PROGRAM not a single project
- GAP should have an appointed Program Manager and a steering committee representing the collaborative organizations and members of the public
- GAP should acknowledge that every project under the program will have an individual EA and satisfy NEPA, including public comments and review.
- GAP should specify the monitoring and reporting of the program and provide benchmarks to measure success and failure.
- GAP should identify follow-up actions that check on the efficacy of completed actions.
- GAP should clearly state how the program satisfies specific Forest Plan goals and Tier based objectives.
- GAP should acknowledge that a similar program is needed for Nantahala NF and the USFS should commit to forming a similar program for Nantahala NF.
- The USFS should commit to giving equal time and effort to Nantahala NF and not allow GAP to take a disproportionate share of funding and resources.
- GAP should have a yearly review and public reporting, to also include substantive feedback and comment as well as annual confirmation of program continuation.
- GAP should provide some examples of projects, perhaps even several initial project proposals, that could help concerned organizations and individuals better understand the type of actions, methods, and locations that are within scope of the PROGRAM.

What are my most significant comments and objections?

- GAP, as proposed, is not a project. It is far too large and goes on for too long to manage as a project.
- The USFS intends to perform a single environmental analysis for the project which does not satisfy NEPA and will lead to continuing friction with concerned individuals and organizations.

- GAP lacks sufficient detail of proposed methods and actions and locations for substantive comment to be made.
- GAP makes broad assumptions regarding the benefit of proposed actions and risks to the landscape. It is not possible to provide informed judgement when there is so little detail about proposed actions and methods and locations.
- GAP does not directly relate project goals and objectives to Forest Plan goals and objectives nor does GAP provide any context for how the project helps the USFS meet specific goals and objectives of the Forest Plan.

Summary

I hope that the USFS reconsiders how GAP is being proposed and makes significant improvements. Foremost, the USFS should organize GAP as a program and tie program goals and objectives to specific goals and objectives of the Forest Plan Tier 1 and Tier 2. The USFS should acknowledge that a single environmental analysis for all the proposed actions of GAP is not sufficient to satisfy NEPA. The USFS should commit to completing GAP as a series of projects managed under a program with appropriate oversight and organizational structure where each project satisfies all NEPA requirements and the public is provided with an opportunity to review and comment. The USFS should create a similar program for Nantahal NF that ensures both Pisgah and Nantahala are managed with equal effort and priority. There is an undeniable tension between the USFS and the public which was evident in the objections to the Forest Plan. The USFS must regain public trust to relieve that tension. The GAP proposal, while made with good intentions, continues a practice of the USFS just saying 'trust us this is a great thing we are doing' without providing the necessary detail to assure the public that the proposal is indeed a good thing.

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